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*Attorneys for Philadelphia Indemnity
Insurance Company*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ARGENT PREPARATORY ACADEMY f/k/a/
SILVER STATE CHARTER SCHOOLS

Plaintiffs,

vs.

PHILADELPHIA INDEMNITY INSURANCE
COMPANY, a Pennsylvania insurance business
corporation; and DOES I through XX,

Defendants.

Case No. 3:18-cv-00134-MMD-WGC

**STIPULATION AND ORDER TO
EXTEND DEFENDANT'S TIME TO
FILE AN OPPOSITION TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED between Plaintiff Argent Preparatory Academy f/k/a Silver State Charter Schools and Defendant Philadelphia Indemnity Insurance Company, by and through the parties' respective counsel, pending the Court's approval, that the

1 date for Defendant to file their opposition to Plaintiff's Motion for Summary Judgment (the
2 "Motion") be extended to August 20, 2018.

3 Pending the Court's approval, counsel for Plaintiff's has graciously agreed to a 3 business
4 day extension, from the current deadline of August 15, 2018 to August 20, 2018. The Motion was
5 filed on July 25, 2018. This request, which is the first request for an extension of the subject
6 deadline, is made primarily in light of defense counsel's recent extensive travel schedule related
7 to deposition discovery in other matters pending in this District and will ensure sufficient time to
8 fully address the issues raised in the Motion.

9 The parties respectfully request that this Court approve the foregoing stipulation.

10
11 DATE: August 14, 2018

DATE: August 14, 2018

12
13 HOLLY DRIGGS WALCH FINE WRAY
14 PUZEY & THOMPSON

FORAN GLENNON PALANDECH PONZI
& RUDLOFF PC

15 By: /s/ F. Thomas Edwards

16 Richard F. Holley, Esq.

17 Clark V. Vellis, Esq.

18 F. Thomas Edwards, Esq.

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Attorneys for Plaintiff

By: /s/ Casey G. Perkins

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22
23 **ORDER**

24 **IT IS SO ORDERED.**

25 DATED this 27th day of August 2018.

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UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested, in this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DEFENDANT'S TIME TO FILE AN OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT** by the method indicated:

_____ U.S. Mail

_____ Facsimile Transmission

__XXX__ Electronic Filing via EC/CMF electronic system

and addressed to the following:

Richard F. Holley, Esq.
Clark V. Vellis, Esq.
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Attorneys for Plaintiffs

DATED: August 14, 2018

_____/s/ Rita Tuttle_____
An Employee of Foran Glennon